

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

KEITH ROSE,	)	
	)	
Plaintiff,	)	
	)	
v	)	Cause No. 4:18-CV-01568-RLW
	)	
CITY OF SAINT LOUIS, MISSOURI, et al.,	)	
	)	
Defendants.	)	

**NOTICE OF SETTLEMENT**

1. On Friday, December 16, 2022, the parties in *Street, et al. v. O'Toole*, 4:19-cv-02590-CDP reached a settlement and executed a memorandum of understanding.

2. *Street, et al. v. O'Toole*, 4:19-cv-02590-CDP is a class action suit related to the same mass arrest event that is the subject of this lawsuit.

3. By the terms of the Street settlement, Plaintiff's September 17, 2017 claims will be included in the *Street* class.

4. The parties are working to expeditiously file a motion for preliminary approval of class certification and the settlement, and they will finalize the proposed terms and request preliminary approval of the Court within 30 days.

5. Accordingly, the parties respectfully request that the Court stay this matter until final approval of class certification in *Street*, at which point Plaintiff will move to dismiss his claims related to that incident.

6. Plaintiff will also work in good faith to communicate with counsel for Defendants in order to determine whether settlement is proper for the remaining claims related to the incident of September 15, 2017. Counsel will Plaintiffs will inform the Court of any progress 30 days from today.

Respectfully submitted,

**KHAZAELI WYRSCH LLC**

/s/ James R. Wyrsh

James R. Wyrsh, 53197MO  
Javad M. Khazaeli, 53735MO  
John M. Waldron, 70401MO  
911 Washington Avenue, Suite 211  
St. Louis, MO 63101  
(314) 288-0777  
(314) 400-7701 (fax)  
james.wyrsh@kwlawstl.com  
javad.khazaeli@kwlawstl.com  
jack.waldron@kwlawstl.com

**CAMPBELL LAW LLC**

Alicia Campbell, 59586MO  
John Campbell, 59318MO  
3470 S. Jefferson  
St. Louis, Missouri 63114  
alicia@campbelllawllc.com  
john@campbelllawllc.com  
*Attorneys for Plaintiff*

**SHEENA HAMILTON  
CITY COUNSELOR**

/s/ Brandon Laird

Brandon Laird 65564 MO  
lairdb@stlouis-mo.gov  
Abby Duncan 67766 MO  
duncana@stlouis-mo.gov  
Adriano Martinez 69214 MO  
martineza@stlouis-mo.gov  
Assistant City Counselors

1200 Market St. City Hall, Rm 314  
St. Louis, MO 63103  
314-622-3361  
Fax 314-622-4956  
*Attorneys for Defendants*